1 2 3 4 5 6 7 8	SCOTT N. SCHOOLS (SCBN 9990) United States Attorney  W. DOUGLAS SPRAGUE (CSBN 202121) Chief, Criminal Division  SUSAN R. JERICH (CSBN 188462) Assistant United States Attorney  450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 Telephone: (415) 436-7158 Facsimile: (415) 436-6982 Email: susan.jerich@usdoj.gov  Attorneys for Plaintiff				
10	UNITED STATES DISTRICT COURT				
11	NORTHERN DISTRICT OF CALIFORNIA				
12	SAN FRANCISCO DIVISION				
13	UNITED STATES OF AMERICA,	No.: CR 05-125 PJH			
14	Plaintiff,	) PARTIES' STIPULATION AND PROPOSED ORDER EXCLUDING			
15	VS.	TIME PURSUANT TO 18 U.S.C. § 3161			
16	KENNETH M. KELLY,	) )			
17	Defendant.	) ) )			
18					
19	The parties stipulate and agree, and the Court finds and holds, as follows:				
20	The parties last appeared before this 0	Court on Wednesday, August 8, 2007 for status.			
21	At that time, defense counsel requested that the matter be continued until September 12, 2007 for				
22	further status.  2. Defense counsel advised the Court that additional time was necessary to effectively				
23					
24	prepare and file documents relevant to an interlocutory appeal in the matter.				
25	3. The parties respectfully request that the remain calendared for September 12, 2007 for				
26	status and request a further exclusion of time, pursuant to 18 U.S.C. § 3161(h)(1)(J).				
27 28	Additionally, pursuant to 18 U.S.C. § 3161 (h)(8)(A), the ends of justice outweigh the interests				
	STIPULATION AND PROPOSED ORDER CR 05-125 PJH				

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1	of the public and defendant in a speedy trial because the defendant requires additional time t		
2	prepare effectively for the appeals process.		
3			
4	SO STIPULATED.		
5	DATED: August 9, 2007	Respectfully Submitted,	
6			
7		/o/	
8		SUSAN R. JERICH	
9	DATED:	Assistant United States Attorney	
10		lo/	
11	]	_/s/Elizabeth Falk Counsel for Defendant Castellanos	
12		Counsel for Defendant Casterianos	
13	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
14	FURSUANT TO STIPULATION, IT IS SO	ORDERED.	
15	DATED: 8/20/07	HON. Planiton	
16	1	HON. Plon's J. Hamilton United State IT IS SO ORDERED	
17			
18		Judge Phyllis J. Hamilton	
19		Judge	
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21		DISTRICT OF	
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5	DATED: August 9, 2007 Respectfully Submitted,		
6			
7	/s/ 34 <u>·</u>		
8	SUSAN R. JERICH Assistant United States Attorney		
9	DATED:		
10	_/s/		
11	Elizabeth Falk Counsel for Defendant Castellanos		
12			
13	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
14			
15	DATED:  HON. Phyllis J. Hamilton United States District Court		
16	United States District Court		
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2	prepare effectively for the appeals process.		
3	3		
4	SO STIPULATED.		
5	DATED: August 9, 2007 Respectfully S	ubmitted,	
6	5		
7	/s/		
8	SUSAN R. JE	RICH ed States Attorney	
9	DATED: 6/17/07	·	
10	" (sux w	beth Falk	
11	Counsel for Do	efendant Castellanos	
12			
13	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
14			
15	HON. Phyllis .	J. Hamilton	
16		District Court	
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